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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

GALLAGHER-KAISER CORPORATION, a
Michigan corporation,

Plaintiff,

vs.

LIBERTY DUCT, LLC, a Nevada limited
liability company; BIO SHIELD TECH, LLC,
a foreign limited liability company;
HARTFORD CASUALTY INSURANCE
COMPANY, an Indiana insurance corporation;
NGM INSURANCE COMPANY, a Florida
corporation; and DOES 1-10 Insurance
Company(ies), inclusive,

Defendants.

NGM INSURANCE COMPANY, a Florida
corporation,

Cross-Claimant,

vs.

LIBERTY DUCT, LLC, a Nevada limited
liability company, DOES 1 through 2,
inclusive,

Cross-Defendants.

Case No. 2:14-cv-00869-GMN-DJA

**STIPULATION AND REQUEST
FOR ORDER EXTENDING
DEFENDANT NGM INSURANCE
COMPANY'S TIME TO REPLY TO
PLAINTIFF'S RESPONSE TO
MOTION FOR SUMMARY
JUDGMENT**

Defendant, NGM Insurance Company ("NGM"), by and through its attorneys of
record, the law firm of Barrett Matura, and Plaintiff, Gallagher-Kaiser Corporation ("GK"),
by and through its attorneys of record, the law firm of Peel Brimley LLP, hereby stipulate

1 and agree to extend the deadline for NGM to file its Reply Brief in Support of its Motion
2 for Summary Judgment (“Reply”). The original deadline for NGM to file its Reply is
3 August 1, 2025. Due to various scheduling conflicts, NGM has requested, and Plaintiff has
4 agreed to, additional time in which to file its Reply. The parties agree and stipulate that
5 NGM shall have up to and including Friday, August 29, 2025 to file its Reply Brief in
6 Support of Motion for Summary Judgment.

7 Dated this 29th day of July, 2025.

8
9 **PEEL BRIMLEY LLP**

10 /s/ Cary B. Domina

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BARRETT | MATURA

/s/ Kevin C. Barrett

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Attorney for NGM Insurance Company

18 IT IS SO ORDERED.

19 Dated this 29 day of July, 2025.

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22 _____
23 Gloria M. Navarro, District Judge
24 UNITED STATES DISTRICT COURT
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CERTIFICATE OF SERVICE

I hereby certify that on July 29, 2025, I electronically transmitted the foregoing document to the Clerk's Office using the CM/ECF system for filing and transmittal of Notice of Electronic filing to the following CM/ECF registrants, and causing a copy to be mailed to all non-ECF registrants.

/s/ Briana S. Willson
Briana S. Willson